MINISTRY OF DEFENCE

The Government's Response to the House of Commons Defence Committee's Second Report of Session 2004-05 on the Armed Forces Bill

THE GOVERNMENT'S RESPONSE TO THE HOUSE OF COMMONS DEFENCE COMMITTEE'S SECOND REPORT OF SESSION 2004-05 ON THE THE ARMED FORCES BILL

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INTRODUCTION

This document is the Government's response to the Defence Select Committee's report on the Tri-Service Armed Forces Bill (second report of session 2004-05, published on 14 March). The Government welcomes the report, which we regard as part of an ongoing process of pre-legislative scrutiny by the Committee in the period leading up to the Bill's introduction. In this document, the Government responds to the points made in the Committee's conclusions and recommendations.

It was not possible to produce a draft version of the Bill in time for it to be considered as part of the Committee's inquiry. The Government instead tried to ensure that the Committee had an early opportunity to consider its proposals, even if this meant being able to do so only in broad terms, because we were conscious of the Committee's busy inquiry programme. We were also concerned that the risk of disruption from a general election would reduce the amount of time that the Committee would be able to devote to scrutiny of the proposals.

This will be a large and complex Bill. It will also be particularly important for our Armed Forces, because the maintenance of discipline is essential to their operational effectiveness. The Bill will replace the different strands of legislation that have existed in the past so that personnel from all three Services – who increasingly train and operate together – will in future be subject to a single system of law that will be the same wherever they serve. The Services have all been closely involved in this work from the outset, and will continue to be so. The Government intends to provide a system that is efficient, consistent and – most important of all – fair. Our aim is to bring forward legislation which is modern and which will stand our Armed Forces in good stead for years to come.

FORMAL RESPONSE TO THE COMMITTEE'S RECOMMENDATIONS

1. While we were content to consider the proposals set out in MoD's Memorandum, the sketchy nature of some of the information, and the lack of any draft clauses, limits the extent to which we have been able to reach substantive and unqualified final conclusions. (Paragraph 6)

This issue was raised in correspondence between the then Under Secretary of State for Defence and the then Committee Chairman before the Committee began its inquiry into the Armed Forces Bill. It was confirmed in these exchanges that it would not be possible to complete work on the Bill in time for a draft to be ready to help with the Committee's inquiry. The Committee therefore agreed to look at our proposals and the Department produced two memoranda which set out the key proposals that would be in the Bill.

Some of the Bill will reflect civilian criminal justice measures already in force or changes that are being made to bring the system of Service law more closely into line with civil law. Some changes are refinements of existing provisions and their significance lies in the detail. We will also be working to refine and simplify them throughout much of the period leading up to the Bill's introduction. Other measures will harmonise existing provisions where differences between the three Services remain.

2. We have not attempted any consideration of more fundamental issues such as the need for a military system of law, or the underlying principles of the existing arrangements. These issues will, however, need to be considered in future procedures relating to the Bill. We recommend that our successor Committee pursues this matter. (Paragraph 7)

We regard a military system of law as essential to the continued operational effectiveness of our forces. The maintenance of the discipline essential to the effectiveness of a fighting force is as necessary in peace as it is in war: a force which cannot display in time of peace the qualities of obedience to lawful orders, observance of the law and appropriate standards of conduct and self-control cannot hope to withstand the much more demanding circumstances of operations, including armed conflict, occupation and peace keeping.

A system of military discipline is also a fundamental part of our obligations under international law. The additional protocol to the Geneva Convention says: "such armed forces shall be subject to an internal disciplinary system which, inter alia, shall enforce compliance with the rules of international law applicable in armed conflict".

3. We consider it very important for MoD to consult with those who will be affected by the proposals in the Tri-Service Armed Forces Bill — the men and women of our Armed Forces. MoD plans to 'start consulting around mid-year'. However, given that the timetable for the introduction of the Bill is autumn 2005, we are concerned that this might lead to less time than is needed for a proper consultation exercise to take place. We consider this issue further in the context of parliamentary scrutiny in Chapter 4 below. We look to MoD to ensure that proper consultation is undertaken and, where appropriate, the outcome of the consultation is reflected in the proposals in the Bill. (Paragraph 12)

We agree that consultation is extremely important and, as our memorandum said, we have already consulted interested stakeholders within and outside the Armed Forces and the Ministry of Defence. The review which was carried out between 2001 and 2003 involved consultation with members of the Armed Forces at all ranks, both in the United Kingdom and abroad.

As well as being consulted, the Services themselves have been intimately involved in developing the proposals in the Bill from the very beginning. This has been achieved formally through the involvement of the three Principal Personnel Officers (the Second Sea Lord, the Adjutant General and the Air Member for Personnel) and has included separate seminars with each of them and his staff.

The Armed Forces Bill Team has members who are drawn from each of the three Services and who, as part of their duties, frequently speak to interested groups, including ones from their own Service, about the proposals set out in the Bill. For some areas of work, we have established separate working groups, again with representatives of all three Services, to help with the consultation and decision making arising from work being done to streamline the provisions that will be included in the Bill. We shall continue active engagement with Service personnel in the period leading up to the Bill's introduction.

A number of changes in the Bill are to reflect, sometimes with necessary modifications, recent changes in the general criminal law, such as those that relate to sentencing in the Criminal Justice Act 2003. The application of these provisions to the Armed Forces were agreed with the Services themselves, and with authorities such as the Judge Advocate General, at an earlier stage. Such matters do not lend themselves to wider consultation as they are required to meet the overall objective of keeping Service law in line with civilian law, so far as it is sensible and practical to do so.

4. The Government plans to introduce the Tri-Service Armed Forces Bill in the autumn of 2005. However, as MoD recognises, there is a great deal of work to be done. We look to MoD to keep us updated on the further development of the proposals in the Bill by way of regular reports. (Paragraph 15)

We welcome the Committee's interest to date. Subject to the Committee's view, we intend to resume active engagement with the new Committee as soon as possible after it is appointed.

5. We find it disappointing that progress in introducing a Tri-Service Armed Forces Bill has been so slow, although MoD explained that the work required has involved substantially more effort than the 'tidying-up exercise' which was originally envisaged. (Paragraph 33)

The Bill is the first comprehensive review of Service law for some fifty years. It therefore represents a very substantial project and one we are determined to get right. The Bill itself has two main functions: harmonisation and modernisation. Finding the common ground needed to establish a single system of Service law that will be equally effective in both the single and joint Service environments has not always been easy and there has had to be compromise on all sides to achieve the greater prize of improving operational effectiveness through single system

of law that is above all fair. And, since 1955, the legislation has been amended piecemeal. Some areas, such as Service offences, have not been systematically reviewed since then.

In developing proposals for the Bill, we have also needed to take into account a number of other factors including court judgements, changes to the civilian criminal law and operational experience around the world.

6. As this Committee and our predecessors have previously concluded, there is a strong case for having a single system of Service law, and the main arguments for this are set out clearly in MoD's Memorandum. The proposal to extend the revised structure for command authority to joint organisations seems sensible, as it should provide for improved discipline arrangements for Service personnel in such organisations. We expect MoD to ensure that there is consistency in the administration of discipline between Service personnel and civilian staff who work in the same organisation. (Paragraph 34)

We welcome the Committee's comments on the importance of consistent disciplinary arrangements for personnel who are drawn from different Services but based within the same joint organisation. This will be an important aspect of the new legislation. It will mean that members of the same joint organisation will all be subject to the same rights, powers and procedures; and that those who should be dealt with by the same authority can be.

We believe it is also appropriate to harmonise some administrative matters that apply to both military personnel and civilians. The Department's recently introduced Harassment Complaints Procedure, which applies equally to Service personnel and civilian staff, is an example of such provision.

7. We share MoD's view that discipline among Service personnel is crucial to maintaining Operational Effectiveness. (Paragraph 36)

We welcome the Committee's comments on this important point. It goes to the heart of the need for a separate system of Service law and recognises the particular demands of our widely deployable, expeditionary and rapid reaction forces.

8. MoD has identified a harmonised list of offences which can be dealt with summarily by Commanding Officers of the three Services, and also the punishments available to them. This has, necessarily, had to reflect a compromise between the three Services. In the Royal Navy, more cases will have to be dealt with at courts martial, and in the Army and RAF, more cases will be able to be dealt with summarily. We welcome the commitment given by the Minister that Commanding Officers will receive a proper programme of training to ensure that they apply discipline fairly, efficiently and consistently. We expect MoD to monitor the effectiveness of this training. (Paragraph 43)

We will monitor the effectiveness of this training. As now, it will not be limited to commanding officers, although they play a key role and will therefore be its major focus. A full training needs analysis will be carried out and we will ensure that there is a mechanism for reviewing training effectiveness on an ongoing basis.

9. The proposals on discipline will result in more cases being dealt with summarily by Commanding Officers. Summary hearings are not considered compliant with Article 6

of the European Convention on Human Rights, but MoD does not consider that the increase in such hearings will result in more legal challenges in the European Court of Human Rights. We consider that there is an increased risk of this happening, and expect MoD to monitor this matter closely. (Paragraph 46)

We consider that the overall system of summary jurisdiction in the Armed Forces is compliant because of the availability of the right to appeal to the summary appeal court and the right to elect court martial trial, with the court martial being limited to the powers of punishment that would have been available to the commanding officer. We are determined to ensure that Service law is compliant with the European Convention on Human Rights while at the same time meeting the operational needs of the Armed Forces.

We do not consider that the proposed changes to summary jurisdiction will increase the risk of a successful challenge to the summary system through the European Court of Human Rights. The increase in jurisdiction is by eight extra offences, all of which are dealt with at present by Royal Navy commanding officers. In addition, commanding officers will not be able to deal with any of these offences without the consent of higher authority.

We keep the matter of compliance with the European Convention on Human Rights under close review.

10. We fully support the proposal in MoD's Memorandum that the right to elect trial by court martial should be universal. (Paragraph 47)

We welcome the Committee's acknowledgement of this point.

11. MoD is proposing to remove the power of a Commanding Officer to dismiss, without any form of hearing, a criminal charge which the Commanding Officer would be unable to deal with summarily. This issue is a feature of a current case which we did not examine because it was sub judice. The proposal would appear to be sensible, but we recommend that MoD gives further consideration to the operational implications of such a change. (Paragraph 49)

We welcome the Committee's support for this change. The intention is to ensure that the decision on whether to prosecute for serious offences will rest with the independent prosecuting authority. Once a court martial offence has been charged, the commanding officer will not be able to dismiss it. We do not believe this will have any adverse operational implications in the limited number of such cases that occur.

12. We note that all three Services operate a formal system of administrative action separate from their criminal disciplinary systems and, from 1 January 2005, the Army introduced new arrangements which distinguish between minor and major administrative action. We find it surprising that, while the Armed Forces Tri-Service Bill is seeking to harmonise Service law, it appears that changes to the system of administrative action in the Army could lead to greater differences between the three Services in this area. Given the need for consistency in disciplinary procedures across all three Services, we look to MoD to ensure that there is similar consistency between the Services relating to the administrative action system. (Paragraph 58)

One of the key principles underlying the introduction of a single system of Service law is consistency of treatment for personnel from each of the three Services.

The development of the new system of administrative action that the Army introduced in January 2005 took account of the provisions that exist in the other two Services. The other Services are aware of both the initiative and the procedural improvements that have flowed from it. Following discussion between the three Services, changes to administrative action have been agreed for personnel based at some joint units to ensure consistency of treatment. All three Services will continue to work closely together to ensure that opportunities are taken to make further changes where this is sensible and practicable.

13. The reduction in the summary powers of Royal Navy Commanding Officers will result in an increase in the number of courts martial. We consider it essential for naval personnel, who are alleged to have committed an offence or offences at sea, that their cases are dealt with as quickly as possible. We expect MoD to ensure that the planned improvements for more expeditious courts martial are delivered. (Paragraph 65)

The Royal Navy has confirmed it can manage within its existing prosecutorial resources. Although a Royal Navy commanding officer has a very wide jurisdiction in theory, it is already effectively restricted by two factors: their limited powers of punishment; and the recognition, which applies in all three Services, that a commanding officer should only deal with simple examples of cases that are within his jurisdiction. A number of the proposed changes – in addition to the establishment of the joint military courts service on 1 April this year and in due course a joint prosecuting authority, three man courts for the majority of lower level cases and the earlier involvement of the police in investigations – will help reduce the delays that have been experienced in the past.

The Royal Navy has established a working group to assess the work arising from the Bill and to provide early visibility of the resourcing and structural implications. The Navy intends to reduce delay, wherever possible in advance of the Bill being introduced.

Separately the Judge Advocate General is working with the appropriate Service authorities to address the causes of delay in bringing cases to trial and has introduced some procedural changes.

14. MoD's Memorandum sets out a number of proposals relating to the courts martial system, these include proposals for a single prosecuting authority and a defence arrangement. It is not entirely clear to us why some of these will be matters for primary legislation and others will not. We expect MoD to set out in more detail the reasons why some of the proposals will not feature in the primary legislation. (Paragraph 69)

The appointment, role and powers of an independent Service prosecuting authority require statutory authority. They are of sufficient importance to require them to be set out in primary legislation. On the other hand, the defence arrangements referred to by the Committee are simply a matter for agreement between the Services to provide a defence function for those personnel who wish to use it. For example, in Germany, RAF lawyers defend Army personnel at courts martial and provide soldiers with legal advice at police interviews. This does not require legislation.

As under the existing legislation, the Bill will provide for a number of matters and detailed provisions to be dealt with in subordinate legislation. A detailed memorandum on the proposed powers will be provided to the Delegated Powers and Regulatory Reform Committee in due course.

15. The courts martial system has been modernised over recent years and the proposals in MoD's Memorandum should push this process further along. However, there appears to us to be further scope to align the system even closer to the equivalent civilian system. Under the current courts martial system the panel, the equivalent of a jury, is not selected randomly. We recommend that MOD gives consideration to the case for having a panel which is randomly selected. (Paragraph 71)

We believe it is important to appoint court martial members who are independent rather than simply picked at random. We seek to achieve this by ensuring that courts martial members are selected at random from a pool which has been widened to include warrant officers, and each of the Services then makes provision to ensure that no conflict arises from this process such as that members are not known to the accused and in the Army that members do not all have the same cap badge.

16. Service personnel who are convicted at court martial have a right of appeal to the Court Martial Appeal Court. There is also a review procedure which MoD proposes to abolish on the grounds that it is no longer necessary to retain this non-judicial process. In 2004, the Reviewing Authorities reviewed 630 cases and in nine per cent of these changed either the finding or sentence, and MoD has acknowledged that the process can have advantages for some defendants. We consider this a substantial percentage. We expect MoD to revisit this proposal and assess whether those convicted in the future will have the same advantages as current defendants have and, if not, to identify ways in which this could be ensured. (Paragraph 75)

The chief objection to Review is one of principle. The Review procedure is based on the idea that a single Service officer acting as the reviewing officer might take a better view of the appropriate finding and sentence than the court martial that heard the case originally. Review is arguably not compliant with the European Convention on Human Rights because it represents non-judicial interference in the decisions of an independent and compliant court. Review has the effect of delaying the defendant's right to appeal to a higher court. Furthermore, Review is not carried out in public and the independent prosecuting authority does not have the opportunity to make representations. This is not satisfactory in the wider interests of justice, including those of the victim.

The Review procedure dates from a time when courts martial could deprive accused persons of their liberty following trials at which no lawyers were present, either as members of the court or as advocates, and there was no right of appeal against sentence to the Courts Martial Appeal Court. Today courts martial are very different: they are compliant with the European Convention on Human Rights. We understand the value that has been placed on Review which can have benefits to the accused. But, following extensive discussion with the Services, we have concluded that in a modern justice system such benefits will be provided more appropriately in future by the safeguards of full rights of appeal against both finding and sentence to the Courts Martial Appeal Court and the availability of bail pending appeal.

For all these reasons we believe that Review is anomalous, and that the justification for it cannot be sustained. We will, however, make every effort to ensure that the arrangements in the Bill continue to deliver timely decisions for those who appeal the outcome of their trial.

17. We support the proposal to increase the minimum qualification for appointment as a judge advocate to match the requirement in the civilian system. (Paragraph 77)

We welcome the Committee's comments. All serving judge advocates have professional qualifications that exceed the proposed minima.

18. We note that MoD is confident that the overall Service discipline system is compliant with the European Convention on Human Rights and that radical change is not required. We expect MoD to continue to keep this issue under close review. (Paragraph 79)

It is our intention to ensure that the system of Service law is compliant with the European Convention and we shall certainly keep this under close review.

19. MoD was receptive to our suggestion that a document should be produced alongside the Bill setting out the reasons why there was a need for disciplinary procedures and offences for Service personnel which are different to those in civil society. We look to MoD to produce such a document with the Bill. (Paragraph 80)

Our communications strategy includes the requirement to describe the need for a separate system of Service law which can be widely accessed by those within and outside the Department. We shall publish such a document with the Bill and arrange for it to be made available, including on the MoD website.

20. MoD has concluded that Service personnel should not be brought within the scope of ordinary contract and employment law as it could undermine the requirement to maintain a disciplined armed service. We consider that this is an issue which MoD needs to keep under review and to look closely at the experience of countries where Service personnel are covered by ordinary contract and employment law. (Paragraph 83)

We do not believe that extending the cover of ordinary contract and employment law in this way is consistent with the essential structure and purposes of our Armed Forces. The structures, including for example the grant of commissions and enlistment on the basis of an oath of allegiance, reflect the constitutional position of the Armed Forces. Perhaps the most important single example of this is that the legal structure governing the Armed Forces is to a large extent now laid down in legislation, reflecting the particular interest of the Legislature in them. Essential to the purposes of the Armed Forces and their performance is the notion of lawful command, which extends under statute to the ability to require Service personnel to remain in service when the need arises: there is no general right to resign. In contrast, the essence of a contract is one of defining and agreeing what an employee has to do. If applied generally, this approach would require a radical change to the structure and operation of the Armed Forces. The relationship between Service personnel and their leaders could be undermined, which in turn could have significant implications for operational effectiveness.

21. The Memorandum sets out a number of proposals to the current grievance

arrangements, including the establishment of a Tri-Service Redress of Complaints Panel. In principle, the proposals as set out in the Memorandum appear sensible ones, although we are concerned that they seem still to be at a very early stage in their development. We are also not clear as to why the proposals relating to the redress of grievances might not be included in the Bill and we expect MoD to set out the reasons for this. (Paragraph 89)

As now, there will be a right to redress, and this right will be on the face of the Bill.

22. The Memorandum outlines a number of proposals relating to Boards of Inquiry. Radical changes are not envisaged to the existing system, but are aimed at ensuring that there are improvements over the current arrangements. We are disappointed that MoD has taken the view that next of kin would only be allowed to attend Boards of Inquiry in exceptional circumstances. We recognise that there may be reasons for not allowing next of kin to attend, for example, where the inquiry needs to consider highly classified material or where the operational environment may make attendance impracticable, but we consider that the presumption should be that next of kin should be allowed to attend and only in exceptional circumstances should they not be. (Paragraph 97)

Boards of inquiry are intended as a wholly internal procedure and are convened for Service purposes. The presence of families might inhibit the openness of witnesses, in addition to being impractical because boards of inquiry can last for months and necessitate travel both inside and outside the United Kingdom. It remains our view that next of kin should not attend boards of inquiry except in exceptional cirumstances. We recognise, however, that next of kin will have a close interest in the board's work and new procedures have been established to keep them informed of progress. Next of kin may if they wish also be given a private briefing by the president on the board's findings, and it has been Departmental policy since 1992 to release board of inquiry reports on fatalities and serious accidents to next of kin or close relatives with the minimum of redaction.

23. MoD has taken the opportunity to review Service offences, including a review of the maximum sentences for each offence. We consider it sensible that MoD has sought to take into account the maximum sentence for comparable civilian offences. (Paragraph 100)

We welcome the Committee's comments. The approach we have taken is in line with our general approach, which is to ensure that Service law closely reflects its civilian counterpart wherever appropriate.

24. We welcome the Minister's commitment to 'proper parliamentary scrutiny,' which we fully endorse. We also support the proposition that the parliamentary scrutiny of the Tri-Service Armed Forces Bill should seek to include the best elements of the procedure used for the quinquennial Armed Forces Bills. (Paragraph 110)

The Armed Forces Bill will be a significant piece of legislation and the Government will endeavour to facilitate the engagement of all those that have an interest.

25. Given the uncertainties with progress on the Bill's preparation and the parliamentary timetable over the coming months, we do not feel able to recommend

a single specific model for its parliamentary consideration. We do, however, recommend that it contains the following elements:

A select committee stage:

if a draft Bill is available for the mid-year consultation that draft should be referred for pre-legislative scrutiny to a select committee (which could be the Defence Committee, assuming that a Defence Committee has been appointed);

if no draft Bill is available before the Bill's introduction, the Bill should be referred, immediately following its second reading, to a select committee (which again could be the Defence Committee). That committee would not formally amend the text of the Bill (unlike an Armed Forces Bill committee) but would produce a report which might include proposed amendments; and

A standing committee stage:

Standing committees meet in public; their proceedings are recorded verbatim; and ministers can be advised by their officials. Furthermore a standing committee's larger membership should allow for the inclusion of representatives of the front benches and a spread of back benchers. It should include members of the select committee which considered the Bill (or draft Bill). Those Members would be able to table and speak to any proposed amendments from the select committee. (Paragraph 114)

26. We recommend that the select committee to which the Bill or draft Bill is referred be given at least three months in which to report and that, if this period includes a substantial period when the House is not sitting, reasonable additional time should be allowed. (Paragraph 115)

The precise arrangements will be discussed through the usual channels. It is our intention that members of both Houses will be appropriately engaged in the scrutiny of the Bill.

27. We recommend that annual continuation orders, subject to the affirmative procedure, should continue to be required for the proposed Tri-Service Armed Forces Bill. (Paragraph 121)

28. We believe that periodic renewal by Act of Parliament must be retained. Given the pace of change in both military operational requirements and in civilian criminal law, there might be an argument for requiring that renewal to be more frequent than every five years, perhaps every three years. We recommend that the MoD consult on this proposition and that the select committee to which the Bill, or draft Bill, is referred consider it in greater detail than we have been able to. (Paragraph 124)

The Department is still considering the renewal arrangements and will come forward with proposals in due course. There is clearly a need for Service law to be kept up to date. But we are not convinced that a guaranteed place for primary legislation to renew the system of Service law would be needed as frequently as every three years. Indeed, doing so could mean that we would have insufficient evidence about how systems were working; the training need would be considerably increased; and there would be greater scope for confusion among personnel subject to Service law.

Additionally, since 2001 we have had the power to amend Service law by statutory instrument to make equivalent provision to changes in civilian criminal justice legislation. We expect to make similar provision in the Bill.

The Bill is intended to strike a better balance between what must be in primary legislation and what can properly be provided for in secondary legislation. This more flexible approach will enable us to be more responsive to genuine needs to change Service law.

29. MoD's review of the regulation-making powers in the Service Discipline Acts is not yet completed. Their approach seems to be largely to translate the existing arrangements into the new legislation. In the absence of definitive proposals we are not able to reach a judgement on whether the proposed bill will contain appropriate regulation-making powers. (Paragraph 129)

30. We recommend that the MoD include the use of regulation-making powers in its consultation and that the select committee to which the bill or draft bill is referred examine this issue. For this purpose we would recommend that MoD produce a detailed delegated powers memorandum, explaining what the delegated powers would be used for and why the negative or affirmative resolution procedure was chosen. We would also recommend that drafts of key secondary legislation should be made available to the parliamentary committees scrutinising the Bill. (Paragraph 130)

In many areas the use of delegated powers is well precedented in existing Service law and should not be controversial.

We will produce a detailed memorandum for the Delegated Powers and Regulatory Reform Committee at the appropriate time in which we are required to address the type of Parliamentary scrutiny we are proposing and the scope of the instruments themselves.

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